

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FUJIAN MINGTA TOYS CO. LTD.,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No. 1:24-cv-05625

**Honorable Judge John Robert Blakey
Magistrate Judge Heather K. McShain**

HEARING DATE: February 12, 2025

HEARING TIME: 11:00 AM CST

**DEFENDANTS SUNTOPDIRECT AND TOPBRIGHT’S
MOTION TO FILE UNDER SEAL**

Defendants Zhejiangaoguangwanjuyouxianzerengongsi dba TOPBRIGHT (“TOPBRIGHT”) and Ningbo Sun Top Trade Co. Ltd. dba SuntopDirect (“SuntopDirect”, collectively the “Defendants”), hereby move this Honorable Court for leave to file the following documents under seal: (1) Exhibit A to the Motion to Enforce Settlement which contains settlement negotiations between the parties with confidential settlement terms; (2) Exhibit B to the Motion to Enforce Settlement which contains the settlement agreement between Plaintiff and SuntopDirect; (3) Exhibit C to the Motion to Enforce Settlement which contains the settlement agreement between Plaintiff and TOPBRIGHT; (4) Exhibit D to the Motion to Enforce Settlement which contains the executed settlement agreement between Plaintiff and TOPBRIGHT; (5) Exhibit E to the Motion to Enforce Settlement which contains the settlement agreement between Plaintiff and SuntopDirect; (6) Exhibit F to the Motion to Enforce Settlement which contains the payment receipt for payment of settlement fee from SuntopDirect to Plaintiff; and (7) Exhibit G to the Motion to Enforce Settlement which contains the Declaration of Wenjun

Li regarding attempts to obtain the fully executed settlement agreements and which includes confidential settlement terms.

Sealing this portion of the file is necessary to prevent disclosure of settlement terms that Defendants and Plaintiff agreed in their settlement agreements to keep confidential. These documents also contain some personal identifying information including banking information.

DATED: January 31, 2025

Respectfully submitted,

By: /s/ William R. Brees

William R. Brees (Florida Bar No. 98886)

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of January 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

By: /s/ William R. Brees
William R. Brees (Florida Bar No. 98886)
BAYRAMOGLU LAW OFFICES LLC